

Appln. No. 09/994,353
Amendment dated August 9, 2005
Reply to Office Action mailed June 8, 2005

REMARKS

Reconsideration is respectfully requested.

Entry of the above amendments is courteously requested in order to place all claims in this application in allowable condition and/or to place the non-allowed claims in better condition for consideration on appeal.

Claims 1 through 32 remain in this application. No claims have been cancelled, withdrawn, or added.

Paragraphs 1 and 2 of the Office Action

The "provisional" double patenting rejection is acknowledged.

Paragraphs 3 through 15 of the Office Action

Claims 1, 2, 4 through 9, 11 through 16, 18 through 23 and 25 through 30 have been rejected under 35 U.S.C. §102(e) as being anticipated by Chen et al. (US 2003/0028650 hereinafter Chen).

Claims 3, 10, 17 and 24 have been rejected under 35 U.S.C. Section 103(a) as being unpatentable over Chen in view of Wang et al. (US Patent No. 6,496,511 hereinafter Wang).

As noted previously, claim 1 of the present application requires "analyzing if said selected feature requires a static IP address to be assigned to said at least one host" and "wherein a static IP address is assigned to said at least one host if said selected feature requires said static IP address". Claim 8 includes similar language. Somewhat similarly, claim 15 requires "means for analyzing if said selected feature requires a static IP address to be assigned to said at least one host". And claim 22 requires "logic capable of being executed by the processor, wherein said logic is capable of . . . analyzing if said feature selected by said user requires a static IP address to be assigned to said at least one host".

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In the "Response to Arguments" section of the final Office Action, it is contended that:

At paragraphs 84 and 85, Chen discloses that after the name of the connection field is completed, the remaining fields including, *inter alia*, the IP address field, are filled automatically *if there is presumed information associated with the connection name* (emphasis added). If there is no presumed information associated with the connection field name field, the other fields including the fixed (static) IP address are assigned to the client. Since the client makes some determination as to whether or not there is configuration information available associated with connection name, the system of Chen analyzes if the selected feature required a static IP address to be assigned.

However, simply because the Chen system may fill in additional connection information once a connection name is entered does provide any evidence that the Chen system is actually performing any analysis of "if said selected feature requires a static IP address to be assigned to said at least one host" so that "a static IP address is assigned to said at least one host if said selected feature *requires* said static IP address". As noted below with respect to paragraph 84 of the published patent application, the Chen application is not describing any analysis of any feature and its requirement of a static IP address, but instead is simply matching (previously entered) characteristics of a connection to a connection name that is being entered by the user. Further, the fact that the Chen patent application refers to this information as "presumed information associated with the name of connection information" indicates that there is no analysis being performed by the Chen system as to what connection characteristics are required by those characteristics, but simply that it is presumed that connection information that was previously associated with a connection name will be also be entered by the user the next time that that connection name is entered.

Significantly, if the previous selection of the type of IP address was incorrect for the desired connection characteristics (for example, a dynamic

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IP address was selected for a connection type or characteristic that required a static IP address), the mistaken selection would be repeated by the Chen system until and only if the user manually changed the entry from the incorrect to the correct. This is clearly not "analyzing if said selected feature requires a static IP address" as required by the claims.

The rejection of the claims in the final Office Action makes additional reference to paragraph 84 of the Chen published patent application, as paragraphs 79, 80, and 85 were previously referenced in the rejection, and were discussed in the previous response (which are reproduced below for completeness). Paragraph 84 of Chen states:

FIG. 10 is a web page that is illustratively displayed upon selecting the CUSTOMIZED DIAL-UP link from the main menu of FIG. 8 when the menu at the left of FIG. 8 fails to display a desired connection. Thus, in FIG. 10, as in FIG. 9, a name of connection field is completed and the remaining fields filled in (either manually or by recognition of presumed information associated with the name of connection information) before selecting connect. Customized modem dial settings are employed when a more complex digit or character string is needed to appropriately control a dial-up modem session.

Clearly, the system of Chen relies upon the user entering the name of the connection and the other information about the connection, unless the system is able recognize the name of the connection as one that has previously been manually entered by the user, and then the Chen system is able to copy that information from the previous entry of the information associated with the connection name entered. Further, nothing disclosed in this portion of the Chen application suggests that the Chen system is performing any "analysis" of whether a selected feature requires a static IP address, and instead the Chen application suggests to one of ordinary skill in the art that the Chen system is simply copying information previously associated with the connection name that is manually entered by the user. This copying appears somewhat similar to the "auto-complete" function of web browsers, in which no analysis of the data is made, but where user-entered information is recognized and information that has previously been

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associated with the user-entered information is simply copied without respect to any analysis of whether the information is accurate or appropriate for the selected feature.

It is therefore submitted that the reliance placed in the "Response to Arguments" portion of the Office Action is not well placed, as the newly referenced paragraph 84 of the Chen application does not provide any evidence of any "analyzing if said selected feature requires a static IP address to be assigned to said at least one host", as required by claim 1.

With respect to this particular requirement, the Office Action relies upon the description in the Chen application at paragraphs 79, 80 and 85. Paragraph 79 of the Chen application states (emphasis added):

Successful login using the web page of FIG. 7 advantageously causes the presentation of a main menu web page, illustratively of the form of the web page shown in FIG. 8. In FIG. 8, a menu including a list of available ISP (or other destination) selections is presented at the left, with scrolling available when the list exceeds the nominal list window size. Such menu entries will include ISPs to which users at clients on LAN 301 subscribe. Upon selection of a list entry, connection information associated with the selection conveniently appears to the right of the list window, in the area denominated NAME OF CONNECTION. Such connection information need not be a network address, but will be an appropriate logical specification of a connection sought to be made. In some cases, a name of an ISP will be appropriate to identify configuration information associated with the desired connection. Selecting the CONNECT screen button then effects the connection to the indicated ISP or other destination.

Thus, as can be appreciated from the above paragraph, once the user of the Chen system has chosen an ISP from a list, the user is then presented with a second list of "connection information associated with the selection" from which to choose. Turning to Figure 8 of the Chen application, which is referenced here, the second list clearly includes as two of the available choices. As the user is clearly presented with these two alternative choices in this list, it is clear to one of ordinary skill in the art that the Chen system requires the user to make the selection between the "FIXED-IP NETWORK"

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option and the "DHCP NETWORKS" option, and thus the Chen system does not "analyz[e] if said selected feature requires a static IP address to be assigned to said at least one host" and "assign[] an IP address to said at least one host, wherein a static IP address is assigned to said at least one host if said selected feature requires said static IP address" as required by the claims.

Further, looking to paragraph 80 of the Chen application, it is also clear from this portion of Chen that even if the desired connection destination is *not* listed in the first list presented to the user, the user chooses from the listing of types of connections, which includes the "Fixed IP address Network" option and the "DHCP Network" option discussed above (emphasis added):

When a connection to a destination not specified in the menu of the main menu web page of FIG. 8 is desired, provision is made in the web page of FIG. 8 to select links to another web page associated with connections in any of the illustrative categories of connections shown in FIG. 8 below the NAME OF CONNECTION field on that page. Specifically, Standard Dial-Up, Customized Dial-Up, Fixed IP address Network, DHCP Network and PPPoE Network connections are shown as available. In other contexts or applications of the present inventive teachings, other particular types of connections will, of course, be available for selection. Selection of one of the illustrative connection-type links in FIG. 8 causes a follow-up web page to be sent to the selecting client from GUI server 450 in FIG. 4. These and other web pages will be discussed below in connection with FIGS. 9-16

Paragraph 85 of the Chen application only further confirms that the user, and not the Chen system, is required to make the choice of the type of connection between options that includes the "FIXED-IP NETWORK" option and the "DHCP NETWORKS" option (emphasis added):

FIG. 11 is a web page that is illustratively displayed upon selecting the FIXED-IP NETWORK link from the main menu of FIG. 8 when the menu at the left of FIG. 8 fails to display a desired connection having a fixed IP address. As with the web pages of FIGS. 9 and 10, a name of a network connection is filled in and the other indicated information (ip_address, mask_address, and gateway) retrieved from a prior session or filled in by at the client device on

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LAN 301. Selecting the connect button again initiates the connection to the indicated address.

Thus, the user is presented with the screen of Figure 11 of Chen when the user chooses the "FIXED-IP NETWORK" option on the menu of FIG. 8, such as in the event that the user is not able to select the desired connection with the fixed IP address, so that the user can manually enter the information associated with the fixed IP address. It is noted that paragraph 86 of Chen, a similar option is provided when the user chooses the "DHCP NETWORKS" option.

In view of the foregoing, it is submitted that one of ordinary skill in the art would understand that the user of the Chen system is required to choose the type of connection desired, and thus the Chen system does not "analyz[e] if said selected feature requires a static IP address to be assigned to said at least one host" and "assign[] an IP address to said at least one host, wherein a static IP address is assigned to said at least one host if said selected feature requires said static IP address", as required by the present claims. It is therefore submitted that the Chen application would not lead one of ordinary skill in the art to the applicant's claimed invention as defined in the independent claims 1, 8, 15, and 22, especially with the requirements set forth above, and therefore it is submitted that these claims are allowable over the prior art. Further, claims 2 through 7, 16 through 21, and 23 through 28, which depend from the independent claims, also include the requirements discussed above and therefore are also submitted to be in condition for allowance.

With respect to claim 29, which requires "wherein said analyzing if said selected feature requires a static IP address is performed automatically", and claim 30, which requires "wherein said analyzing if said selected feature requires a static IP address is performed without user intervention", it is noted that the referenced portions of Chen require user

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action to enter the connection name, and also require that the further connection information have previously been entered by the user.

Withdrawal of the §102(e) and §103(a) rejections of claims 1 through 30 is therefore respectfully requested.

Paragraphs 16 through 19 of the Office Action

Claim 31 has been rejected under 35 U.S.C. Section 103(a) as being unpatentable over Chen in view of Chupin et al. (hereinafter referred to as "Chupin").

Claim 32 has been rejected under 35 U.S.C. Section 103(a) as being unpatentable over Chen in view of Favier et al. (hereinafter referred to as "Favier").

Claim 31 requires "wherein said list of available features includes blocking access to the Internet from said at least one host", and claim 32 requires "wherein said list of available features includes designating said at least one host as a demilitarized zone (DMZ) host".

It is submitted that neither the Chupin nor the Favier patents provide the analysis function of claim 1 that is missing from the Chen patent application, and therefore it is submitted that the rejections of claims 31 and 32 should be withdrawn.


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CONCLUSION

In light of the foregoing amendments and remarks, early reconsideration and allowance of this application are most courteously solicited.

Respectfully submitted,

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